

**REMARKS**

**I. CLAIM REJECTIONS UNDER U.S.C. § 103**

Claims 1-43 stand rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 6,178,511 (Cohen) in view of U.S. Patent No. 6,535,879 (Behera).

Claims 1, 22, and 43 each recites assigning *the local user schema* to the first user with a first user role when the first user logs into the network node, and assigning *the local user schema* (i.e., the same “local user schema” as recited with respect to the first user) to the second user with a second user role when the second user logs into the network node, wherein the first user and the second user have different privileges on the network node (Emphasis added). According to the Office Action, it would have been allegedly obvious to one with ordinary skill in the art to modify the CIM data of Cohen to include the access schema as described in Behera to form the resulting subject matter of claims 1, 22, and 43. Applicants respectfully disagree.

**A. The motivation to combine Cohen and Behera is not present.**

Applicants respectfully submit that the motivation to combine Cohen and Behera is not present. To establish a case of obviousness under 35 U.S.C. § 103, there must be some motivation to combine the teaching of the references. (M.P.E.P. 706.02(j)). Furthermore, the fact that the references can be combined or modified is not sufficient to establish prima facie obviousness. (M.P.E.P. 2143.01). Rather, the prior art must suggest the desirability of the claimed invention. (M.P.E.P. 2143.01).

According to the Office Action, providing “more security in protecting the data using different roles for different users” is allegedly the motivation to combine Cohen with Behera. However, Applicants respectfully submit that the cited references do not provide such motivation. Even assuming that somehow either of the cited references discusses providing security in protecting data, Applicants submit that such does not automatically result in a “motivation” to combining Cohen with Behera, and even less, to modify the CIM data of Cohen to include the access schema of Behera. In addition, Applicants note that neither Cohen nor Behera contains any suggestion, express or implied, that they be combined, or that they be combined in the manner as recited in claims 1, 22,

and 43. To the extent that the Examiner disagrees, it is respectfully requested that the Examiner point to where that motivation can be found so that Applicants can address the basis for the Examiner's conclusion that the references are properly combinable. Because either of the prior art relied on by the Examiner fails to disclose or suggest any motivation for, or desirability of, the limitations as recited in claims 1, 22, and 43, Applicants submit that modifying the prior art without relying on a teaching or suggestion from the prior art is impermissible hindsight. For at least the foregoing reasons, Applicants respectfully submit that a prima facie case for the § 103 rejection has not been established, and request that the § 103 rejection for claims 1, 22, and 43 be withdrawn.

B. The combination of Cohen and Behera fails to disclose or suggest the claimed subject matter of claims 1, 22, and 43.

Applicants further submit that if Cohen and Behera were to be combined, their combination does not disclose or suggest the above limitations - assigning *the local user schema* to the first user with a first user role when the first user logs into the network node, and assigning *the local user schema* (i.e., the same "local user schema" as recited with respect to the first user) to the second user with a second user role when the second user logs into the network node, wherein the first user and the second user have different privileges on the network node (Emphasis added).

Applicants agree with the Examiner that Cohen does not disclose or suggest these limitations. According to the Office Action, column 4, lines 45-46, and column 3, lines 38-45 of Behera disclose such limitations. However, column 4, lines 45-46 of Behera discloses, "Allow access based on a role: ACL: (list of attrs) (allow (read) role = "engineer")" and column 3, lines 38-45 discloses:

There are three ways that a DSAdmin can grant users access privilege:  
implicitly specifying the user in the ACL rules.  
granting access to a group and adding the user to the group.  
granting access to a role and adding that role to the user's roles.

As such, the cited passages of Behera do not disclose or suggest assigning *the local user schema* to the first user with a first user role when the first user logs into the network node, and assigning *the local user schema* to the second user with a second user role when the second user logs into the network node, wherein the first user and the second user have different privileges on the network node, as recited in claims 1, 22, and 43. Since Cohen and Behera both fail to disclose or suggest the

limitations recited in claims 1, 22, and 43, they cannot be combined to form the resulting subject matter of these claims.

Claims 1, 22, and 43 also each recites mapping a first global user identification and a second global user identification to a local user schema (i.e., the first and second global user identifications are mapped to a *same* local user schema). According to the Office Action, column 7, lines 11-27 and figures 7 and 8 of Cohen discloses the above limitations. However, the cited passage of Cohen discloses:

At step 52, the logon coordinator 26 substitutes given data received from the PKM into substitution variables in the invocation strings returned from the CIM. In particular, the logon coordinator performs a matching operation; for each PKM target entry, the coordinator determines whether there is a corresponding CIM entry. If so, step 52 binds the two entries together. This is illustrated in FIG. 8. At step 54, the logon coordinator 2E invokes the logon method(s) defined by and stored in the CIM. This completes the processing.

Generalizing, the logon coordinator (LC) thus takes the data from the personal key manager (PKM) and the directives in the CIM and interprets the data, together with current state information, to perform a given action. Such action is carried out with respect to the users' systems and applications and includes for example, a logon operation, a change password operation, or a logoff operation.

As such, the cited passage discloses comparing a CIM entry with a PKM target entry, and does not disclose or suggest mapping a first global user identification and a second global user identification to a local user schema (i.e., the *same* local user schema for both the first and second global user identifications), as recited in claims 1, 22, and 43 (See pages 21-25 of the subject application for an example illustrating how a user identification is mapped to a local user schema). Behera fails to make up the deficiency presented in Cohen, and therefore, cannot be combined with Cohen to form the resulting subject matter of claims 1, 22, and 43.

For at least the foregoing reasons, claims 1, 22, and 43, and their respective dependent claims, are believed allowable over Cohen, Behera, and their combination.

## II. INFORMATION DISCLOSURE STATEMENT

Applicants had previously submitted an Information Disclosure Statement dated October 28, 2003 containing seven references listed on Forms PTO/SB/08a and PTO/SB/08b. An initialed Form PTO/SB/08a was attached to the Office Action dated September 1, 2004, wherein reference nos. 1-6

were initialed. However, Applicants have not received confirmation that reference no. 7 listed on Form PTO/SB/08b has been considered. Applicants hereby respectfully request an initialed copy of Form PTO/SB/08b which includes reference no. 7.


**CONCLUSION**

Based on the foregoing, all remaining claims are believed in condition for allowance. If the Examiner has any questions or comments regarding this response, please contact the undersigned at the number listed below.

The Commissioner is authorized to charge any fees due in connection with the filing of this document to Bingham McCutchen's Deposit Account No. 50-2518, referencing billing number 7010852002. The Commissioner is authorized to credit any overpayment or to charge any underpayment to Bingham McCutchen's Deposit Account No. 50-2518, referencing billing number 7010852002.

Respectfully submitted,  
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